

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as  
Administrators of the Estate of LOUIS  
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;  
BLANCHE CARNEY, Former  
Commissioner of Philadelphia Dept. of  
Prisons; LALITHA TRIVIKRAM;  
MAUREEN GAY; MARIESHA  
APOLLON; BLAIR CABELLOS; GENA  
FRASIER; WANDA BLOODSAW,

Defendants.

No. 2:24-cv-05618-TJS

**JURY TRIAL DEMANDED**

**JOINT MOTION FOR EXTENSION OF TIME TO FILE ANSWER**

The Parties respectfully move this Court for an order extending all discovery and filing deadlines in the Court's Case Management Order of February 11, 2025 (ECF No. 23) by 120 days. The Parties also request that the deadline for participating in a settlement conference before Magistrate Judge Scott W. Reid be extended until June 23, as the Parties are scheduled to complete that settlement conference on that day. In support of this request, the Parties state the following:

1. This Court's previous order requires the parties to complete fact discovery by June 4, 2025, submit expert reports by July 4, complete expert discovery by August 1, and file motions for summary judgment by August 15, 2025. (ECF No. 23, ¶ 3).

2. Since that order, the Parties have actively engaged in the discovery process. Plaintiffs submitted separate Requests for Production of Documents (RPDs) and Interrogatories on the City of Philadelphia and YesCare defendants respectively on February 20, 2025.

3. On March 12, at the request of counsel for the City of Philadelphia and Blanche Carney, Plaintiffs' counsel agreed to a 15-day extension for responding to discovery requests, and offered that same extension to the YesCare defendants.

4. The City responded to Plaintiffs' initial RPDs and Interrogatories on April 14, 2025. That initial response included more than 2,500 pages of records.

5. On April 22, 2025, Plaintiffs sent a letter to counsel for the City outlining what Plaintiff considered deficiencies in the City's discovery production and requesting a telephonic conference.

6. On April 29, 2025, Plaintiffs' counsel and counsel for the City conducted an extensive phone conference and worked in good faith to resolve discovery disputes. These Parties engaged in a follow-up conference on May 15 to determine what additional production will be forthcoming, and identify if there remain any further disputes between the Parties. Progress has been made on these matters and the Parties will be following up via email and at a meeting the last week of May.

7. YesCare Defendants required additional time to produce their responses to Plaintiffs' RPDs and Interrogatories, providing them on April 24, 2025.

8. On March 13, 2025, Plaintiffs filed a Motion for Leave to File an Amended Complaint. (ECF No. 25). The Court granted this Motion and Plaintiffs Amended Complaint was deemed filed. The Complaint added four new defendants.

9. Mariesha Apollon has retained counsel, who join this motion, and filed a motion to dismiss. Plaintiffs filed a brief in opposition on May 15.

10. On May 19, Ms. Apollon served Requests for Production of Documents, Interrogatories, Expert Interrogatories, and Insurance Interrogatories on Plaintiffs.

11. Blair Cabellos has been served in this matter. Counsel for YesCare has recently been authorized to represent her and will be entering his appearance on her behalf and filing an Answer to the Amended Complaint imminently.

12. Plaintiffs will direct further discovery requests at these new defendants as well.

13. Plaintiffs also intend to conduct depositions of each defendant, as well as 30(b)(6) depositions upon receipt of further document production and other written discovery. This will require review of the many thousands of pages of records that have been and still are to be produced prior to those depositions. Coordinating the schedules of deponents and counsel will also require considerable time.

14. Counsel for the City contacted Judge Reid on April 10, 2025 to schedule a settlement conference. Judge Reid's earliest availability was June 23, 2025. The settlement conference is scheduled for that date. The Parties intend to engage in good-faith negotiations to determine if this matter can be resolved without additional litigation.

15. In the event this matter does not resolve at the settlement conference, the Parties request an additional 120 days to complete fact discovery in light of the anticipated volume of records to be produced and depositions to be taken.

16. The Parties do not make this request lightly and fully understand the importance of proceeding through the discovery process as efficiently and as timely as possible. However, in

light of the factors discussed above, the Parties believe the request extension is essential for ensuring a fair and comprehensive discovery process.

WHEREFORE, the Parties jointly move the Court for an Order extending the discovery and filing deadlines in the Case Management Order of February 11, 2025 (ECF No. 23) by 120 days.

Respectfully submitted,

*/s/ Bret Grote*

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DATE: May 21, 2025

**CERTIFICATE OF SERVICE**

I, Bret Grote, hereby certify that on May 21, 2025, I caused to be served a true and correct copy of the foregoing Joint Motion to Extend Discovery to the following via the Court's ECF system:

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